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Counsel for Defendant China Export & Credit Insurance Corporation a/k/a Sinosure

**UNITED STATES DISTRICT COURT
DISTRICT OF UTAH CENTRAL DIVISION**

ORBIT IRRIGATION PRODUCTIONS, INC.,
a Utah Corporation,

Plaintiff,

vs.

SUNHILLS INTERNATIONAL, LLC, a
California limited liability company; and DOES
1-10,

Defendants.

ORBIT IRRIGATION PRODUCTIONS, INC.,
a Utah Corporation,

Plaintiff,

vs.

**DECLARATION OF
JEAN-CLAUDE MAZZOLA**

Consolidated Case No. 1:10-cv-00113 DB

Honorable Dee Benson

[Case No. 1:11-cv-0012-DB]

TAIZHOU DONGFANG LIGHT DECORATIONS CO., LTD., a Chinese company; ZHEJIANG HONGCHEN IRRIGATION EQUIPMENT CO., LTD, a Chinese Corporation; LUO JUN, an individual; CHINA EXPORT & CREDIT INSURANCE CORPORATION a/k/a SINOSURE, a Chinese corporation; JANICE CAPENER, and individual; DAN CAPENER, an individual; SUNHILLS INTERNATIONAL, LLC, a California limited liability company; RONG PENG, an individual; TIM MIKA, an individual; “MEGAN DOE,” and individual; “MANDY DOE,” and individual; and DOES 3-10,

Defendants.

JEAN CLAUDE MAZZOLA declares, pursuant to the provisions of 28 U.S.C. § 1746:

1. I am a member of the law firm of Wilson, Elser, Moskowitz, Edelman & Dicker LLP, attorneys for Defendant CHINA EXPORT & CREDIT INSURANCE CORPORATION a/k/a SINOSURE (“Sinosure”). I am familiar with the facts and circumstances set forth herein.

2. This declaration is submitted, together with the Affirmation of Yang Xuejin, the Memorandum of Law, and the exhibits annexed hereto in support of Sinosure's motion to dismiss Plaintiff’s Second Amended Complaint pursuant to Fed.R.Civ.P.12(b)(2).

3. A true and accurate copy of Plaintiff’s Second Amended Complaint is annexed hereto as Exhibit “A”.

4. A true and accurate copy of the Supplier Agreement entered into by and between Orbit and Hong Chen, is attached hereto as Exhibit “B”. Although that Supplier Agreement contains a Utah choice of jurisdiction clause, Sinosure is not a signatory to that contract.

5. A true and accurate English language exemplar of the short term Export-Credit Insurance Policy entered into by and between Dongfang/Hong Chen and Sinasure, is attached hereto as Exhibit "C".

Dated: New York, New York
June 19, 2012

Respectfully submitted,

WILSON, ELSER, MOSKOWITZ,
EDELMAN & DICKER LLP

By: /s/ Jean Claude Mazzola
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